

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DEWINA L. DANLEY.

Plaintiff,

v.

JOYCE R. ZYDLO, individually and as Trustee
of the Stanley M. Zydlo Trust, date[d]
May 26, 1981,

Defendant

Civil Case No. 16-cv-2872

Judge Sharon Johnson Coleman
Magistrate Judge Jeffrey Cole

**NOTICE OF MOTION
FOR RULE 26(d)(1) MOTION
FOR LEAVE TO INITIATE
EXPEDITED DISCOVERY ON
“INFORMATION AND BELIEF”
ALLEGATIONS**

NOTICE OF MOTION

To:

Mason S. Cole, Esq.
Amanda Banks, Esq.
Cole Sadkin LLC
20 S. Clark Street, Suite 500
Chicago, Illinois 60603

PLEASE TAKE NOTICE that on Wednesday, August 3, 2016 at 8:45 a.m., the undersigned shall appear before the Honorable Sharon Johnson Coleman in the Courtroom usually occupied by her (Courtroom 1425) at the Dirksen Federal Building, 219 South Dearborn, Chicago, Illinois 60604 and then and there present Defendant's Rule 26(d)(1) Motion for Leave to Initiate Expedited Discovery on "Information and Belief" Allegations, a copy of which motion is being served upon you.

Respectfully Submitted,
Defendant, Joyce R. Zydlo, individually and
as Trustee of the Stanley M. Zydlo Trust, dated
May 26, 1981,

By: /s/Jeffrey C. Blumenthal
Her Attorney

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Notice of Motion was served on the below counsel for the plaintiffs via the Court's ECF system on July 28, 2016.

Mason S. Cole, Esq.
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By: /s/Jeffrey C. Blumenthal
Attorney for Defendant, Joyce R. Zydlo